



State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES

6 Hazen Drive, P.O. Box 95, Concord, NH 03302-0095
(603) 271-2900 FAX (603) 271-2456



June 23, 2003

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

LETTER OF DEFICIENCY
No. WMD 03-14

Paul Hartman
Stericycle, Inc.
369 Park East Drive
Woonsocket, RI 02895

Re: Hazardous Waste Transporter Vehicle Inspection
Tractor VIN: 1FUBABA823LK54004 Tractor VIN: 1PT07HAE8G9002993

Dear Mr. Hartman:

On June 10, 2003, personnel from the Department of Environmental Services, Waste Management Division ("DES") conducted an inspection of a Stericycle, Inc. ("Stericycle") vehicle. The inspection was conducted at I-93, Hooksett Tolls, Hooksett, NH.

The purpose of the inspection was to determine Stericycle's compliance status with RSA 147-A and rules adopted pursuant thereto relative to hazardous waste transportation.

During the inspection, DES personnel observed the following:

1. The vehicle did not have the company's name displayed in three inch lettering on both sides of the power or waste carrying unit.
2. The vehicle did not have the company's hazardous waste transporter registration number (TNH number) adequately displayed on both sides of the power or waste carrying unit.
3. DES personnel issued a Report of Hazardous Waste Transporter Inspection ("Report") to the driver of the vehicle. The Report advised Stericycle to reletter the vehicle next time it was painted to meet the requirements of Env-Wm 603.06.

This letter serves to inform you that the above referenced conditions constitute violations of RSA 147-A and Env-Wm 100 to 1100, specifically:

Env-Wm 603.06(a)(3)

Failure to display the company's hazardous waste transporter registration number in permanent and legible lettering on both sides of all power or waste carrying units used to transport hazardous waste.

Env-Wm 603.06(c)

Failure to display the name of the company, corporation, association, or proprietorship in permanent and legible lettering measuring a minimum of three inches on both sides of all power or waste carrying units used to transport hazardous waste.

On June 11, 2003, DES personnel conducted a compliance file review of Stericycle. During an inspection conducted by DES personnel on October 10, 2002, at I-93, Hooksett Tolls, Hooksett, NH, DES personnel observed the same violations noted above. DES personnel issued a Report to the driver noting the deficiencies. The Report required that Stericycle ensure that the TNH No. is displayed in permanent and legible lettering on both sides of all power or waste carrying units used to transport hazardous waste, ensure that the TNH No./Company name is displayed in lettering a minimum of three inches high and submit written documentation within 30 days addressing the corrective action taken to come into compliance. On November 1, 2002, DES personnel received a letter from Mr. Hartman, stating "all deficiencies noted on the report have been abated as of 1 Nov 02."

As this is a repeat violation, DES believes that the cited deficiencies can be corrected by completing the following remedial actions:

1. Within 60 days receipt of this letter, ensure that the name of the company, corporation, association, or proprietorship is displayed in permanent and legible lettering measuring a minimum of three inches on both sides of all power or waste carrying units used to transport hazardous waste.
2. Within 60 days receipt of this letter, ensure that the transporter registration number is displayed in permanent and legible lettering measuring a minimum of three inches on both sides of all power or waste carrying units used to transport hazardous waste.
3. Within 65 days receipt of this letter, submit to DES written confirmation that these steps have been completed, including photographs, at the address below.

Please address all correspondence and reports regarding this matter to:

Tammy Calligandes, Waste Management Specialist
Department of Environmental Services
6 Hazen Drive
Concord, NH 03301

In the event compliance is not achieved within the time period indicated above, the DES may initiate enforcement action against Stericycle, including issuing an order requiring the deficiencies to be corrected, and/or referring the matter to the New Hampshire Department of Justice for imposition of civil and/or criminal penalties. Please be advised that the DES reserves its right to pursue administrative penalties for the violations noted above.

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Your prompt cooperation is appreciated. Please contact Tammy Calligandes at 603-271-3899 if you have any questions or need further assistance.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kenneth W. Marschner", is written over a large, bold, black "COPY" stamp.

Kenneth W. Marschner
Administrator
Waste Management Programs

Certified Mail RRR#: 7000 1670 0000 0584 3243

CC: DB/Town/File
Philip J. O'Brien, Ph.D., P.G., Director, WMD
Gretchen Rule, DES Legal Unit

Enclosures: 10/10/02 Report, 6/11/03 Report, Stericycle Response dated 11/1/02